

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
SOUTH BEND DIVISION**

KASTURI HALDAR,

Plaintiff,

v.

UNIVERSITY OF NOTRE DAME DU LAC,
SANTIAGO SCHNELL, AND CINDY
PARSEGHIAN,

Defendants.

Case No. 3:24-cv-00836-
CCB-SJF

**PLAINTIFF KASTURI HALDAR'S UNOPPOSED MOTION TO UNSEAL MOTION
FOR RECONSIDERATION**

Plaintiff Kasturi Haldar hereby moves this court to unseal DE 36, Plaintiff's
Emergency Motion for Reconsideration. As grounds therefore Plaintiff states as follows:

1. Plaintiff filed her Emergency Motion for Reconsideration on November 18, 2024. DE 36. At the time the motion was filed, the transcript of the hearing on Plaintiff's Motion for Preliminary Injunction, which was referenced throughout the Motion for Reconsideration and attached as an exhibit, had not been made public. *See* DE 34 and accompanying notice from Court setting transcript release date of Feb. 11, 2025.
2. At the time the motion was filed, the parties had sought, but the court had not yet entered, a Protective Order. *See* DE 35 (Joint Motion for Protective Order filed Nov. 15, 2024), DE 47 (Protective Order entered Dec. 2, 2024).

3. Because the transcript on which the motion relied was not publicly available, and because there was no protective order yet in place, Plaintiff filed her motion under seal.
4. Judicial records are presumed to be public, and good cause must be established to seal records and to maintain records under seal. *Citizens First Nat. Bank of Princeton v. Cincinnati Ins. Co.*, 178 F.3d 943, 945 (7th Cir. 1999).
5. Here, no party moved to redact the transcript or file it under seal, and the transcript is now released to the public. The original grounds for sealing—that the hearing transcript was not public and there was no protective order to guide the parties—are no longer applicable. There is therefore no longer good cause to maintain these documents under seal.
6. Plaintiff therefore moves to unseal her Motion for Reconsideration and accompanying exhibits DE 36-1, and 36-4.
7. With respect to DE 36-2 and DE 36-3, which contain the names of individuals not party to this case and information deemed confidential under the governing Protective Order, DE 47 at § 2(A)(5), Plaintiff seeks leave to file publicly the redacted versions attached hereto as exhibits.
8. Pursuant to Section II of this Court’s “Courtroom Procedures and Trial Practice,” counsel for Plaintiff conferred with Defendants’ counsel on March 21, 2025 and March 27, 2025, and Defendants’ counsel stated that Defendants do not oppose the relief requested in this Motion.

WHEREFORE, Plaintiff respectfully requests that her Emergency Motion for Reconsideration, DE 36, as well as accompanying exhibits DE 36-1 and DE 36-4 be unsealed,

that attached Exhibit 1 be filed publicly in place of sealed exhibit DE 36-2, and that attached Exhibit 2 be filed publicly in place of sealed exhibit DE 36-3.

Dated: March 27, 2025

Respectfully submitted,

KASTURI HALDAR

By: /s/ Naomi R. Shatz

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**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I certify that on March 27, 2025 I electronically filed the foregoing document and that it is available for viewing and downloading from the Court's CM/ECF system, and that all participants in the case are registered CM/ECF users and that service will be accomplished by CM/ECF.

/s/ Naomi R. Shatz
Naomi R. Shatz